

SERVE

EXHIBIT  
A

STATE OF MAINE  
AROOSTOOK, ss.

SUPERIOR COURT  
DOCKET NO.

MICHAEL D. BUBAR,

PLAINTIFF

vs.

WALMART INC.

DEFENDANT

COMPLAINT

NOW COMES the Plaintiff, Michael D. Bubar, by and through his attorney, Patrick E. Hunt, Esq., of Patrick E. Hunt, P.A., and alleges as follows:

1. The Plaintiff, Michael D. Bubar (hereinafter "Bubar"), is a natural person, and has a mailing address of Post Office Box 67, 58 US Route 212, Merrill, County of Aroostook, and State of Maine 04780.
2. The Defendant, Walmart Inc. (hereinafter "Walmart"), is a corporation duly organized and existing under the law of the State of Maine, is and was at all times herein mentioned, a business organization engaged in business retail sales, c/o C T Corporation System, and having a mailing address of 128 State Street #3, Augusta, County of Kennebec, and State of Maine 04330.
3. On April 8, 2023, Bubar was walking across the Walmart parking lot at Ludlow Road, Houlton, County of Aroostook, and State of Maine 04730, when he sustained an injury to his left-hand ring finger, because of negligence of an employee of Walmart.
4. Walmart then and there owed to Bubar the following duties:
  - A. To maintain its business in a safe and habitable manner; and
  - B. To provide safety training procedures for all employed staff.
5. Walmart then and there failed to perform each of said duties and breached each of said duties.
6. At all times herein mentioned, Bubar was in the exercise of due care and caution, in a safe manner, and was free from any negligence.
7. Bubar, alleges that he sustained his injury, as a proximate consequence of the breach of

said duties by Walmart.

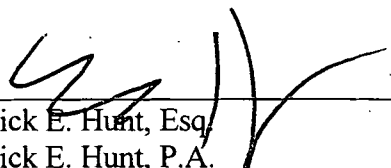
8. Because of the injury resulting from the negligence of Walmart; Bubar has incurred expenses for the following, which will be made known to the Court at a later date.
  - a. Injury to his left hand ring finger;
  - b. Pain and suffering;
  - c. Mental anguish;
  - d. Hospital care;
  - e. Medicines;
  - f. Travel expenses; and
  - g. Other expenses.
9. On June 16, 2023, a Notice of Claim was mailed to Walmart, (a copy of which is attached hereto, is incorporated by reference, and is identified as Plaintiffs' Exhibit #1)

Wherefore, Bubar requests that this Honorable Court grant him Judgment against Walmart for damages in the amount of:

- |   |   |
|---|---|
| A. Pain and suffering:  | Such as are reasonable in the premises. |
| B. Negligent infliction of mental distress:   | Such as are reasonable in the premises. |
| C. Houlton Regional Hospital, and continuing:   | Such as are reasonable in the premises. |
| D. Pines Health Services, and continuing:   | Such as are reasonable in the premises. |
| G. Prescriptions and medicines in an unknown amount which will be made known to the Court at a later date:  | Such as are reasonable in the premises. |
| I. Other physicians, hospitals, nurses, pharmacies, and medical apparatus which may be incurred in the future, and which will be made known to the Court at a later date: | Such as are reasonable in the premises. |
| J. His costs for professional services:   | Such as are reasonable in the premises. |
| K. His costs:   | Such as are reasonable in the premises. |
| M. Whatever other relief the Court may  | Such as are reasonable in the premises. |

deem just and necessary:

DATED at Island Falls, Maine this 8<sup>th</sup> day of September, 2023.



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